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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

KATHLEEN ESPARZA,)	Case No.: 2:23-cv-00681-AC
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME FOR
v.)	PLAINTIFF TO FILE HER MOTION
)	FOR SUMMARY JUDGMENT AND
KILOLO KIJAKAZI,)	SUPPORTING BRIEF
Acting Commissioner of Social Security,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that Plaintiff shall have an extension of time to file her Motion for Summary Judgment and Supporting Brief. This is Plaintiff's first request for an extension.

Plaintiff respectfully requests that this Court grant a 30 day extension to file her Motion for Summary Judgment and Supporting Brief from July 12, 2023, to August 11, 2023. Plaintiff intends on raising numerous fact-intensive issues in this case, and the certified administrative record is in excess of 5,400 pages. Additionally, this is the second appeal to the Federal District Court regarding Plaintiff's application for disability benefits, adding complexity to the procedural history and issues presented.

1 The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3
4 Respectfully submitted,

5 July 5, 2023
6 DATED

/s/ Meghan O. Lambert
MEGHAN O. LAMBERT, ESQUIRE
Attorney for Plaintiff, Kathleen Esparza


8
9 July 5, 2023
10 DATED

By: /s/ Geralyn Gulseth
(*as authorized by email on June 21, 2023)
Geralyn Gulseth
Special Assistant U.S. Attorney
Attorneys for Defendant

11
12
13 **ORDER**

14 APPROVED AND SO ORDERED:

15
16 DATED: July 5, 2023


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE